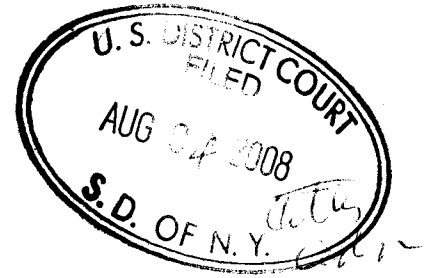


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



MARIBEL VALDEZ,

Plaintiff,

vs.

ECOLAB INC.,

Defendant.

Case No. 1:08-cv-5235

MOTION TO ADMIT RYAN L. NILSEN PRO HAC VICE

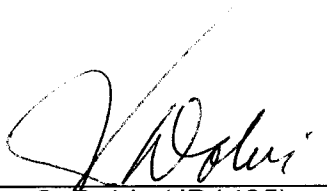
Under Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, JAMES S. DOBIS, a member in good standing of the bar of this Court, hereby move for an Order allowing admission pro hac vice of:

RYAN L. NILSEN, ESQ.
BOWMAN and BROOKE LLP
150 South Fifth Street, Suite 3000
Minneapolis, MN 55402
Phone: (612) 339-8682
Fax: (612) 672-3200

RYAN L. NILSEN is a member in good standing of the Bar of the States of Minnesota and Wisconsin.

There are no disciplinary proceedings against RYAN L. NILSEN in any State or Federal Court.

Dated: New York, New York
July 29, 2008



James S. Dobis (JD1425)
DOBIS, RUSSELL & PETERSON, P.C.
7 Elk Street, Lower Level
New York, NY 10007
Telephone: (212) 593-3310
Fax: (973) 740-2484

ATTORNEYS FOR ECOLAB INC.

TO: Mauricio Malagon, Esq.
MALAGON & ASSOCIATES
Attorneys for Plaintiff
The Woolworth Building
233 Broadway, Suite 1800
New York, New York 10279
(212) 227-1767

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____)	
MARIBEL VALDEZ,)	Case No. 1:08-cv-5235
)	
Plaintiff,)	
)	
vs.)	
)	
ECOLAB INC.,)	
)	
Defendant.)	
_____)	

**AFFIDAVIT OF JAMES S. DOBIS IN SUPPORT OF THE
MOTION TO ADMIT RYAN L. NILSEN PRO HAC VICE**

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

JAMES S. DOBIS, by way of Certification in lieu of oath or affidavit, says:

1. I am an Attorney At Law of the State of New Jersey and a Partner in the law firm of Dobis, Russell & Peterson, P.C., attorneys for defendant, Ecolab Inc. I am fully familiar with the facts of the within litigation. I make this statement based on my personal knowledge of the facts set forth herein and in support of defendant's motion to admit Ryan L. Nilsen as counsel pro hac vice to represent defendant in this matter.

2. I am a member in good standing of the Bar of the State of New York and was admitted to practice law in September of 1984. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Nilsen is a partner at the firm of Bowman and Brooke LLP, in Minneapolis, Minnesota.


4. Mr. Nilsen is a member of the State Bar of Minnesota and has been a member of the Bar since 2000. I know him to be an attorney of high moral character, integrity, and competence. He is experienced in federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to move the admission of Ryan L. Nilsen pro hac vice.

6. I respectfully submit a proposed Order granting the admission of Ryan L. Nilsen, which is attached hereto as Exhibit "A".

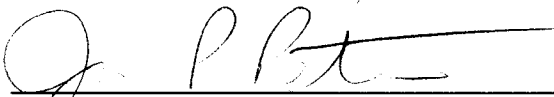
WHEREFORE, it is respectfully requested that the motion to admit Ryan L. Nilsen pro hac vice, to represent defendant, Ecolab Inc., in the above-captioned matter, be granted.

Dated: New York, New York
July 29, 2008


James S. Dobis (JD1425)
DOBIS, RUSSELL & PETERSON, P.C.
7 Elk Street, Lower Level
New York, NY 10007
Telephone: (212) 593-3310
Fax: (973) 740-2484

ATTORNEYS FOR ECOLAB INC.

Sworn to and subscribed before me,
this 29th day of July, 2008


Notary Public, State of New Jersey
James P. Peterson, Esq.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARIBEL VALDEZ,
Plaintiff,
vs.
ECOLAB INC.,
Defendants.

AFFIDAVIT OF RYAN L. NILSEN

[illegible]

Ryan L. Nilsen, being first duly sworn, deposes and states as follows:

1. I am a partner with the law firm of Bowman and Brooke LLP, located at 150 South Fifth Street, Suite 3000, Minneapolis, MN 55402.

2. I am an attorney and member of the bar in good standing and duly licensed to practice in the State of Minnesota (admitted 10/2001), U.S. District Court for the District of Minnesota (admitted 2001), the State of Wisconsin (admitted 3/18/08), and the United States Fourth Circuit Court of Appeals.

3. Bowman and Brooke LLP is national product liability defense counsel for Ecolab Inc. Ecolab has requested that Bowman and Brooke LLP serve as lead counsel in this case.

4. I have never been refused *pro hac vice* admittance to any court. I have never been sanctioned or disciplined in any manner by any court or bar association.

5. I seek admission to this Court *pro hac vice* for the purpose of acting as co-counsel with James S. Dobis, Esq., Dobis, Russell & Peterson, P.C., 326 South Livingston Avenue, Livingston, New Jersey 07039, on behalf of the defendant, Ecolab Inc. The Court and opposing counsel may readily communicate with James S. Dobis, Esq., regarding the conduct of the case.

6. I am currently licensed, in good standing, and admitted to practice before the U.S. District Court for the District of Minnesota. A Certificate of Good Standing from the U.S. District Court for the District of Minnesota is attached to this Affidavit. Further, no disciplinary action or investigation of my conduct is pending.

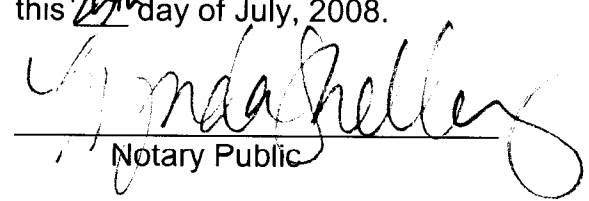
7. I have represented defendant Ecolab Inc. in various matters in the past and have acquired a specialized skill and knowledge with respect to the matters involved in the trial of this lawsuit. I have been requested by Ecolab Inc. to appear and participate in this matter.

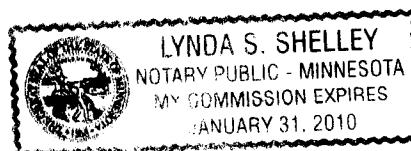
8. For these reasons, I respectfully request admission *pro hac vice* to this Court and State. I further agree to be bound by the rules governing the Courts in the State of New York.

9. Under penalty of perjury I attest to the truth and accuracy of the facts in this Affidavit and that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


RYAN L. NILSEN

Subscribed and sworn before me
this 25th day of July, 2008.


Notary Public



UNITED STATES DISTRICT COURT

District of Minnesota

**CERTIFICATE OF
GOOD STANDING**

I, Richard D. Sletten, Clerk of this Court, certify that


Ryan L. Nilsen, Bar # 304086, was duly admitted

to practice in this Court on July 20, 2001, and is in

good standing as a member of the Bar of this Court.

Dated at Minneapolis, Minnesota, on July 25, 2008.

RICHARD D. SLETTEN, CLERK



(By) Deborah D. Bell, Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARIBEL VALDEZ,

Plaintiff,

vs.

ECOLAB INC.,

Defendant.

Case No. 1:08-cv-5235

AFFIRMATION OF SERVICE

I, JAMES S. DOBIS, ESQ., **declare under penalty of perjury:**

1. I am a member of the law firm of Dobis, Russell & Peterson, P.C., attorneys for the defendant, Ecolab Inc., in the within matter.

2. On July 29, 2008, I served a copy of a Motion to Admit Ryan L. Nilsen Pro Hac Vice on behalf of defendant, Ecolab Inc., to plaintiff's attorney, Mauricio Malagon, Esq., MALAGON & ASSOCIATES, The Woolworth Building, 233 Broadway, Suite 1800, New York, New York 10279, via regular mail.

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: New York, New York
July 29, 2008

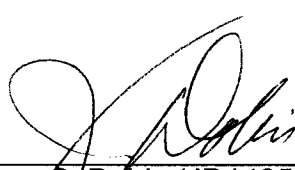

James S. Dobis (JD1425)
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Telephone: (212) 593-3310
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EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARIBEL VALDEZ.

Plaintiff,

VS.

ECOLAB INC.,

Defendant.

Case No. 1:08-cv-5235

ORDER FOR ADMISSION
PRO HAC VICE OF
RYAN L. NILSEN, ESQ.

Upon the motion of JAMES S. DOBIS, attorney for Ecolab, Inc., and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that:

RYAN L. NILSEN, ESQ.
BOWMAN and BROOKE LLP
150 South Fifth Street, Suite 3000
Minneapolis, MN 55402
Phone: (612) 339-8682
Fax: (612) 672-3200
Email: ryan.nilsen@bowmanandbrooke.com

is admitted to practice pro hac vice as counsel for Ecolab Inc., in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of the Court, including Rules governing discipline of attorneys.

IT IS FURTHER ORDERED, that a conformed copy of the within Order be served upon all attorneys of record within seven (7) days of the date hereof.

Dated:

U.S.D.J.